

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 13
)	
ZELLA MAE GREEN,)	CASE NO. 04-60083
)	
Debtor.)	JUDGE MURPHY
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)	
ZELLA MAE GREEN,)	
)	CONTESTED MATTER
Movant,)	
v.)	
)	
LITTON LOAN SERVICING,)	
)	
Respondent.)	
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**MOVANT'S FIRST REQUESTS FOR PRODUCTION
OF DOCUMENTS AND THINGS TO LITTON LOAN SERVICING**

TO: LITTON LOAN SERVICING AND ITS ATTORNEYS OF RECORD, MORRIS,
SCHNEIDER & PRIOR, L.L.C.

Pursuant to Federal Rules of Bankruptcy Rule 7026 to 7037 and 9014, you are hereby requested to appear in person and to produce in the office of Howard D. Rothbloom, 166 Anderson Street, Marietta, Georgia 30060 at 10:30 o'clock a.m. on the 18th day of April 2004, the following listed documents and things to be inspected and retained or copied and to explain said documents:

- 1.) An account history through the date of service of this Notice from each entity in the chain of title, including an analysis of the account history that can be understood by Debtor, Debtor's counsel and the Court. Such histories should include, but not be limited to, monthly interest charges, legal fees, late fees, property inspection fees, property preservation fees, processing fees, bankruptcy fees, fax fees, history fees, payoff statement fees, lawyer referral fees, and fees paid to servicing agents.
- 2.) Proof of security interests in Debtor's real property in the form of original, admissible evidence, not copies, including, but not limited to, the original

deed to secure debt and promissory note, and all transfers and assignments of said instruments from the original holder of said instruments to each and every party in the chain of title.

- 3.) Powers of attorney granted to servicing agents.
- 4.) All pooling and servicing agreements or trust agreements associated with this loan.
- 5.) The original loan file, including, but not limited to: proof of Borrower's income; verification of Borrower's income; Borrower's credit report; evaluation of Borrower's credit; credit application; real property appraisal; itemization of amount financed; HUD 1 Settlement Statement; Truth in Lending Disclosure Statement; all other documents signed by Borrower at closing; originals or front and back copies of checks issued to pay closing costs and fees and third party debts.
- 6.) All insurance policies force placed on Debtor's real property since the origination of the account.
- 7.) All documents, including, but not limited to, correspondence and legal notices related to each and every foreclosure proceeding against Debtor's property and in relation to the debt owned or serviced by Litton Loan Servicing.
- 8.) All servicing agreements between Litton Loan Servicing and other parties relating to Debtor's account from the date of the origination of the account.

Respectfully submitted this 15th day of March 2004.

/S/

HOWARD D. ROTHBLOOM
Attorney for Movant
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770-792-3636